

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PAUL FINKELSTEIN,

Plaintiff,

v.

LEACHGARNER, INC.

Defendant.

Civil Action No. 1:22-CV-11116-NMG

JOINT STATEMENT

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1(d), Plaintiff, Paul Finkelstein and Defendant LeachGarner, Inc., (collectively, the “Parties”) submit the following Joint Statement. Counsel for the Parties have conferred pursuant to Fed. R. Civ. P. 26(f), Fed. R. Civ. P. 16(b) and Local Rule 16.1. The Parties do not object to the Court setting a schedule based on the proposed deadlines herein.

A. PROPOSED PRE-TRIAL SCHEDULE

In order to litigate the issues of this case in the most efficient manner, the Parties jointly propose the following schedule:

Event

Deadline

Initial Disclosures Completed:

October 3, 2022

Motions to Amend Pleadings served by:

December 1, 2022

Fact Discovery Deadline

Written Discovery served by:

March 31, 2022

Discovery completed by:

June 30, 2023

Dispositive Motions

Dispositive motions filed by:	July 31, 2023
Oppositions to dispositive motions filed by:	August 31, 2023
Reply brief, if applicable, filed by:	September 14, 2023
Status Conference	TBD by court
Pretrial Conference	TBD by court

Expert Discovery

The Parties agree to propose a schedule for expert discovery, if any, after the close of fact discovery.

B. SCOPE OF DISCOVERY

The parties do not anticipate the need for any modification of discovery limitations under the Federal Rules of Civil Procedure or the Local Rules of the District of Massachusetts.

C. CERTIFICATION OF CONFERENCE REGARDING BUDGET AND ALTERNATIVE DISPUTE RESOLUTION

Certifications pursuant to Local Rule 16.1(d)(3) will be submitted by the Parties separately.

D. SETTLEMENT PROPOSALS

Plaintiff has provided a settlement demand to Defendant.

E. CONSIDERATION OF CONSENT TO TRIAL BY MAGISTRATE JUDGE

The Parties do not consent to proceeding to trial by a magistrate judge.

Respectfully Submitted,

Plaintiff

By His attorney,

/s/ Suzanne Herold

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Defendant,

By Its attorneys,

/s/ Sarah E. Lovejoy

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Dated: September 9, 2022

CERTIFICATE OF SERVICE

This hereby certifies that on this 9th day of September 2022 a true and accurate copy of the above document was filed with the Court via the ECF system and served upon all counsel of record.

/s/ Sarah E. Lovejoy
Jackson Lewis P.C.